

OIL AND GAS RCRA INSPECTIONS

2016 Inspections in the Colorado Denver-Julesburg Basin

BACKGROUND: OILFIELD INSPECTIONS IN 1990'S – 2000'S

- **Oil and Gas Environmental Assessment Team (OGEAT)**
 - US EPA Region 8, US Fish & Wildlife Service Region 6, BLM, and State Oil & Gas Commissions
 - Inspections conducted in Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming

WHY IS USEPA CONDUCTING THESE INSPECTIONS?

- To protect human health & the environment
- National & Regional Energy Extraction Initiative
 - Goal: to ensure energy extraction activities are complying with federal/state environmental statutes/regulations

WHY IS USEPA CONDUCTING THESE INSPECTIONS?

- To provide consistent evaluation across US EPA Region 8 states
 - Recent activity (last 10 years)
 - Colorado Denver-Julesburg Basin – commencing 2016
 - Montana Bakken – 2015, returning 2016
 - North Dakota Bakken – 2013-2015
 - Utah (statewide) – 2006
 - Wyoming (statewide) – 2006-2015

RCRA APPLICABILITY

- RCRA §3007 authorizes inspections in connection with a number of RCRA provisions including RCRA's imminent hazard authority
- RCRA §7003 statutory authority (non-delegable)
 - Any solid waste or hazardous waste as defined in the RCRA statute
 - E&P wastes
 - Addresses situations that “may present an imminent and substantial endangerment to health or the environment”
 - Any actual or potential threat to human health
 - Any actual or potential threat to wildlife (e.g., takings of migratory birds)

WHAT IS USEPA LOOKING FOR?

- Primarily operation and maintenance at crude oil production sites:
 - Spills
 - Pooled or standing crude oil



- Inadequate secondary containment around tank batteries or heater treaters



- Improper management of onsite pits



- Missing heater treater “witches caps”
on exhaust stacks



- Missing grates beneath pump jack sucker rods



- Uncovered recycle pump oil catchment/drip basins



- Uncovered buckets or drums of crude oil



- Wildlife mortalities



bird



mouse



salamanders

RESULTS OF PAST INSPECTIONS

- Site-specific: recommendations of best management practices (BMPs)
- RCRA §7003 orders have been issued when actual or potential harm was identified
 - Respondents required to develop immediate response plan to abate the threat and follow an Operations and Maintenance workplan



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